

**Public Records (Scotland) Act 2011**

**Scottish Police Authority**

**The Keeper of the Records of Scotland**

**12<sup>th</sup> July 2018**

**Contents**

1. Public Records (Scotland) Act 2011 ..... 3  
2. Executive Summary ..... 4  
3. Authority Background ..... 4  
4. Assessment Process ..... 5  
5. Model Plan Elements: Checklist ..... 6  
6. Keeper’s Summary .....21  
7. Keeper’s Determination .....21  
8. Keeper's Endorsement.....x

## 1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came fully into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor record keeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

## **2. Executive Summary**

This report sets out the findings of the Keeper's assessment of the RMP of the Scottish Police Authority by the Public Records (Scotland) Act 2011 Assessment Team following its submission to the Keeper on 28<sup>th</sup> April 2016.

The assessment considered whether the RMP of the Scottish Police Authority was developed with proper regard to the 14 elements of the Keeper's statutory Model Records Management Plan (the Model Plan) under section 8(3) of the Act, and whether in this respect it complies with it and the specific requirements of the Act.

The outcome of the assessment and the Keeper's decision on whether the RMP of the Scottish Police Authority complies with the Act can be found under section 7 of this report with relevant recommendations.

## **3. Authority Background**

The Scottish Police Authority was established under the Police and Fire Reform (Scotland) Act 2012 to maintain policing, promote policing principles and continuous improvement of policing, and to hold the Chief Constable to account.

It holds both the Chief Constable to account for the policing of Scotland, and the Chief Executive of the Scottish Police Authority to account for its role as employer of staff and the delivery of services to the board and policing.

Since 1 April 2013, the Chief Executive is also responsible for the management of Forensic Services in Scotland.

## 4. Keeper's Assessment Process

The RMP was assessed by the Public Records (Scotland) Act Assessment Team on behalf of the Keeper. Assessors used the checklist elements listed in section 5, to establish whether the Scottish Police Authority's RMP was developed with proper regard to the elements of the Model Plan and is compliant with the Act. The assessment also considered whether there was sufficient supporting evidence of such compliance.

### Key:

<b>G</b>	The Keeper agrees this element of an authority's plan.		<b>A</b>	The Keeper agrees this element of an authority's plan as an 'improvement model'. This means that he is convinced of the authority's commitment to closing a gap in provision. He will request that he is updated as work on this element progresses.		<b>R</b>	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Keeper may choose to return the RMP on this basis.
----------	--	--	----------	--	--	----------	--

## 5. Model Plan Elements: Checklist

### Scottish Police Authority

Element	Present	Evidence	Notes
1. Senior Officer <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The Records Management Plan (RMP) of Scottish Police Authority (SPA) identifies Lindsey McNeill, Director of Governance and Assurance, as the individual with senior management responsibility for records management.</p> <p>Submitted as evidence is Ms McNeill's Job Description (Appendix 1) which states that she is the Senior information Risk Owner (SIRO) for SPA. It also outlines her responsibility for delivering the SPA's statutory obligations relating to Information Management. Ms McNeill reports to the Chief Executive Officer.</p> <p>A letter accepting the position as Senior Officer responsible for records management has also been submitted as evidence (Appendix 2).</p> <p>Senior Management meetings are held on a weekly basis where any information governance issues can be discussed as well as anything relating to the RMP.</p> <p>The Keeper agrees that an appropriate individual has been identified to take strategic responsibility for records management as required by the Public Records</p>

			(Scotland) Act 2011.
2. Records Manager <i>Compulsory element</i>	<b>G</b>	<b>G</b>	<p>The RMP states that the Head of Information Security and Assurance and the Records Manager are both responsible for the secure management of SPA’s public records. The RMP goes on to state that the Records Manager will be responsible for the day to day operation of the RMP.</p> <p>The Assessment Team has been provided with an email accompanying the RMP which confirms that for the purposes of the Public Records (Scotland) Act 2011 Carol-Anne Hilley is SPA’s Records Manager. The Records Management Policy and Standard Operating Procedure (version 1.0, January 2017) also confirms Ms Hilley as Records Manager.</p> <p>Also submitted as evidence is the Records Manager’s Job Description (Appendix 4) which clearly states that the individual has responsibility for records management within SPA.</p> <p>The Keeper agrees that an appropriate individual has been named to take operational responsibility for records management within SPA.</p>
3. Policy <i>Compulsory element</i>	<b>G</b>	<b>A</b>	<p>SPA has submitted its Records Management Policy and Standard Operating Procedure (SOP) (Appendix 5) . This document is labelled as version 1.0, dated January 2017. It outlines SPA’s commitment to properly managing its records in compliance with its statutory and operational requirements. It describes the scope and objectives of the policy, the requirements which staff are to follow and allocates responsibilities for ensuring compliance with the Policy.</p> <p>The introduction to this Element states ‘The policy should appear on the authority’s website and should certainly be available to all staff whether directly connected to</p>

			<p>record keeping or not.’ SPA has submitted a screenshot showing the location of the Records Management Policy and SOP on their intranet. This provides evidence that staff are able to access the Policy and are therefore aware of their responsibilities towards records management.</p> <p>Also submitted is the Information Management Strategy (Appendix 6). This is a strategy which applies to the SPA’s predecessor bodies, The Scottish Police Services Authority (SPSA) and the Scottish Drug Enforcement Agency (SDEA), and it is assumed by the Keeper that this document is still current. He would be grateful for confirmation of this. Page 3 of the Strategy indicates that it is version 3, but the Version Control Sheet indicates that it is version 3.1. The Strategy sets out the high level aims and objectives to ensure effective Information Management within the authority.</p> <p><b>As part of the ‘Development Plan’ associated with this Element, SPA has indicated that the Strategy will be reviewed and updated to reflect the changes in the organisation. This will be carried out alongside the work to create an overarching Operations Manual which will supersede a suite of policies, including the following:</b></p> <p><b>Records Management Policy;</b></p> <p><b>Information Security Policy (Appendix 9) – this Policy describes the security procedures in place to protect the information managed by SPA and identifies the individuals responsible for ensuring this happens;</b></p> <p><b>Data Protection Policy (Appendix 10) – outlines SPA’s approach and commitment towards complying with the Data Protection Act 1998.</b></p> <p><b>The Keeper requests that he is sent the revised strategy and manual when</b></p>
--	--	--	---



			<p>they become available.</p> <p>The Keeper agrees that SPA has a Policy Statement which outlines its corporate approach to records management and that staff are made aware of their responsibilities. As part of this agreement the Keeper requests that he is sent copies of the updated Information Management Strategy and the Operations Manual, referred to above, once they have been approved and are operational.</p>
4. Business Classification	<b>A</b>	<b>G</b>	<p>SPA has provided a screenshot of the top level of the fileplan relating to the Corporate Services' area of the shared drive. The RMP states that the creation of folders at the top level is controlled by Information Management to ensure that document naming is consistent and that access controls can be applied to certain areas of the fileplan. It also states that work is currently underway to implement the fileplan in Forensic Services. An email from the Records Manager (see Element 2) to a colleague in Forensic Services has been submitted as evidence. This email contains a spreadsheet as an attachment which sets out the proposed file structure for the department. Alongside the work to implement the fileplan, work is also being done to weed current information in line with the requirements of the retention schedule. The RMP states that SPA intends to have completed work on the West Division by June/July 2017 and will then roll this out to the remaining divisions. The Keeper requests that he is kept informed on the progress of this work.</p> <p>Staff are provided with training on Data Protection and Information Security and on Records and Information Management. The PowerPoint presentations of these training sessions have been submitted as evidence (Appendices 14.1 and 14.2). The Records and Information Management training also provides guidance on document naming and version control. The RMP states that this training is provided on induction and refresher courses as and when necessary. The Keeper commends</p>

			<p>this commitment to training.</p> <p>The Development Plan section of the RMP also states that each business area within Corporate Services have been informed that they have to begin weeding both electronic and paper records.</p> <p><b>The Keeper can agree this Element on an ‘Improvement Model’ basis. This means that the authority has identified a gap in provision (the lack of an organisation-wide Business Classification Scheme (BCS)/fileplan) and has evidenced how they intend to close this gap. As part of this agreement the Keeper will require to be kept updated as this work progresses.</b></p>
5. Retention schedule	<b>G</b>	<b>G</b>	<p>SPA follows the retention schedule of Police Scotland. The schedule was created from the legacy schedule of the Association of Chief Police Officers in Scotland (ACPOS). SPA’s predecessor body, the Scottish Police Services Authority (SPSA), had contributed to the development of the schedule. The schedule has been submitted as evidence (Appendix 7). This is version 1.02 and was due for review in October 2014. The Keeper was informed at the time of submission that the schedule is currently being reviewed, although the Development Plan section of this Element states that it will be reviewed in January 2017, and he therefore requests that he is sent the updated schedule when it is available.</p> <p>The RMP states that the schedule is available to staff on SPA’s intranet. SPA has submitted a screenshot of its intranet showing that the retention schedule is available to staff.</p> <p><b>The RMP states that the Information Management team will audit provisions once the proposed fileplan has been rolled out in order to ensure compliance with the schedule. The Keeper would be interested to see a sample of the results of the audit when available.</b></p>

			<p>The Keeper agrees that SPA has an operational retention schedule which details the retention periods and actions for the categories of records and information it creates. As part of this agreement, the Keeper requests that he is sent a sample of the audit results of the implemented fileplan when this becomes available and that he is provided with an update when the review of the schedule has taken place.</p>
<p>6. Destruction Arrangements <i>Compulsory element</i></p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>SPA follows the destruction arrangements of Police Scotland which are set out in the Secure Destruction and Disposal of Data Standard Operating Procedure (SOP) (Appendix 8). This is version 1.01 and was due for review in December 2014. The Keeper was informed at the time of submission that the SOP is currently being reviewed and he therefore requests that he is sent the updated document when it is available.</p> <p>The arrangements set out in the SOP are as follows:</p> <p><b>Paper records</b> – SPA follows the standards set out in the HMG Information Assurance Standard No. 5 (IAS/5) for the destruction of protectively marked paper. Approved cross-cutting shredders are provided in several locations across the organisation which are capable of securely shredding confidential documents. There are also secure bags or bins for placing confidential waste into. These are then collected and destroyed by a contractor under supervision. Section 12 of the SOP states that this process will be subject to occasional audit and destruction certificates will be issued by the contractor. SPA has submitted a sample destruction certificate from its secure paper destruction contractor (Shred-It).</p> <p><b>Electronic records</b> – SPA has provided information regarding the procedures in place for the destruction of electronic records. SPA manages its electronic records primarily by using a shared drive system, access to which is controlled. The RMP states that as SPA has only been in existence since 2013 they are not yet at the</p>

			<p>stage where they need to destroy records. Staff are, however, asked to regularly review records (such as deleting draft copies of records and duplicates) and this is done at the very least on an annual basis. Prior to staff being asked to review records, the Records Manager and the Information Security Manager assess the current storage limits and once the exercise has been completed these are checked again. SPA uses an Image Management System (IMS) and a Criminal History System (CHS) both of which have pre-determined weed dates built in to them and both systems have an audit facility to ensure the management of this. Sampling also takes place to measure the quality of records being held. This may require the renaming of records to comply with the file naming conventions, duplicate information being deleted and the updating of file access permissions.</p> <p><b>Hardware</b> – Police Scotland provides SPA’s IT service and the destruction of obsolete hardware and electronic media is also covered by Police Scotland’s Secure Destruction and Disposal of Data (SOP). The SOP describes the procedures in place to ensure the secure destruction of hardware. Hardware or storage media that can be re-used is sanitised to IAS5 standard and those which can’t be re-used are destroyed by a specialist contractor. The SOP states that the destruction must be witnessed by staff and a destruction certificate should be provided. SPA have supplied a sample destruction certificate provided by a third party contractor carrying out the hardware destruction on behalf of SPA.</p> <p><b>Back-ups</b> – As part of their additional response to the Keeper, SPA has supplied its ICT Backup Policy which details the schedule of back-ups for SPA’s electronic records and systems and also describes the periods for which these back-ups are retained.</p> <p>The Keeper can agree that SPA has measures in place to securely dispose of records at the end of their retention periods.</p>
--	--	--	--

<p>7. Archiving and Transfer <i>Compulsory element</i></p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The SPA was created as part of the legislation which created Police Scotland. As a result they inherited the legacy records of its predecessor body, Scottish Police Services Authority (SPSA) and also of the Association of Chief Police Officers in Scotland (ACPOS). SPA has been in touch with the Client Management Team at National Records of Scotland (NRS) with regards to ensuring that the relevant records selected for permanent preservation are transferred to an appropriate archive (NRS). The Keeper commends this pro-active approach to preserving records of organisations that no longer exist.</p> <p><b>The RMP states that a Memorandum of Understanding (MoU) is currently being drafted to cover records created by SPA that may be of historical interest. This MoU will form part of a long term high-level arrangement which would allow SPA to transfer records selected for permanent preservation to NRS when appropriate. SPA has indicated that discussions with NRS client managers are progressing and that a further meeting has been arranged in the very near future. This is confirmed by NRS client managers. The standard MoU template is currently being revised by NRS client managers to take account of GDPR and may lead to a delay in the finalisation in the MoU. The Keeper accepts this and looks forward to receiving the finalised MoU in due course.</b></p> <p><b>The Keeper can agree this Element on an ‘Improvement Model’ basis. This means that the authority has identified a gap in provision (the lack of a formal agreement with an archive for the transfer of records selected for permanent preservation) and has outlined a commitment to closing this gap. As part of this agreement the Keeper requests that he is sent the finalised MoU at the earliest opportunity.</b></p>
<p>8. Information Security</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>SPA has submitted its Information Security Policy (Appendix 9). This describes the measures that are in place to protect the information it creates and manages. The</p>

<p><i>Compulsory element</i></p>			<p>Policy outlines the roles and responsibilities of staff for complying with the measures set out within it. SPA networks and systems are accredited to allow it to connect to the Public Services Network (PSN). The Policy also details the measures in place to ensure physical security, access to systems, encryption and secure destruction of information. The Policy is supported by a number of other policies, including:</p> <p>Physical and Environmental Security Policy (Appendix 12) covers the threats to the physical security of staff and buildings and the measures to be taken to counter these;</p> <p>Remote Access/Working Security Policy and Procedure (Appendix 13) describes the actions to be taken to protect information when SPA staff work out-with the 'normal' office environment. <b>Small point, the version number on the front page is given as version 1.0 but that which appears on the document control sheet is version 1.1. The Keeper recommends this is amended when suitable;</b></p> <p>Protective Marking Policy (Appendix 15) sets out the arrangements in place for protecting information based on the Government Protective Marking Scheme (GPMS);</p> <p>Electronic Communications Policy (Appendix 16) describes the protocols for using email, the internet and social media.</p> <p>The RMP states that these policies are available on the SPA's intranet. SPA has submitted a screenshot of the intranet area where these policies are available to staff.</p> <p>A sample of information security training has also been submitted (Appendix 14.1).</p> <p>The Development Plan section of this Element states that these policies will be</p>
----------------------------------	--	--	---

			<p>replaced by an all-encompassing Operations Manual. This is due to be completed in September 2016. The Keeper requests sight of this Manual once it has been finalised.</p> <p>The Keeper agrees that appropriate procedures are in place to protect the information and records created and managed by SPA.</p>
<p>9. Data Protection</p>	<p><b>G</b></p>	<p><b>A</b></p>	<p>SPA have submitted their Data Protection Policy (Appendix 10) as evidence. The Policy highlights SPA’s commitment to complying with the Data Protection Act 1998. The introduction states that the Policy will be reviewed at least annually. Appendices D and E to the Policy provide guidance on dealing with Subject Access Requests.</p> <p>All staff are required to undertake Data Protection training at their induction. A sample of this has been submitted as evidence (Appendix 14.1).</p> <p>SPA is registered as a Data Controller with the Information Commissioner’s Office (registration number Z3570648).</p> <p>SPA has provided a link to the area on their website which informs their stakeholders how they can request personal data held by SPA.</p> <p>SPA has submitted a screenshot showing the location of the Data Protection Policy on their intranet.</p> <p>The Development Plan section of this Element states that the Policy, amongst others, will be replaced by an all-encompassing Operations Manual. This is due to be completed in September 2016. The Keeper requests sight of this Manual once it has been finalised.</p> <p><b>Since the original submission of the Scottish Police Authority plan the new</b></p>

			<p><b>GDPR/Data Protection Act 2018 has come into force. The Keeper accepts that SPA will amend their procedures to take account of these changes and produce a new Data Protection Policy or section of the overarching Operations Manual or both. The Keeper is happy to agree this element of the SPA Records Management Plan on the condition that the amended policy/guidance is provided when required (approximately one year from this agreement).</b></p> <p>The Keeper agrees that SPA are aware of their responsibilities under the Data Protection Act and that staff are provided with appropriate training and guidance.</p>
<p>10. Business Continuity and Vital Records</p>	<p><b>A</b></p>	<p><b>G</b></p>	<p>The RMP states that departments within SPA have their own individual Business Continuity Plans (BCPs). Copies of the BCPs are held locally and also by SPA's Business Continuity Lead and at Police Scotland. The RMP also states that SPA is unable to send the Keeper a sample BCP as evidence due to the sensitivity of SPA's business. SPA has supplied an email from the Director of Governance and Assurance (see Element 1) stating that SPA has Business Continuity Plans in place for all relevant business areas and that these have also been agreed by the Senior Management Group. The Keeper can accept this statement.</p> <p>SPA has supplied its ICT Backup Policy which details the schedule of back-ups for SPA's electronic records and systems and also describes the periods for which these back-ups are retained</p> <p><b>The Development Plan section of this Element states that the work to identify, manage and preserve vital records is underway. The work to move records from 'Strathclyde 8' is anticipated to be completed by December 2017. The work will be monitored by the Director of Governance and Assurance on a monthly basis.</b></p>



			<p>The Keeper can agree this Element on an 'Improvement Model' basis. This means that the authority has identified a gap in provision (lack of vital records), and has indicated how it intends to close this gap. As part of this agreement, the Keeper requests that he is regularly kept up to date with the progress of this work.</p>
11. Audit trail	<b>A</b>	<b>G</b>	<p>The RMP states that legacy SPSA paper records are now stored on-site on SPA premises. A spreadsheet has been submitted which is being used to index the legacy records which SPA's predecessor bodies have created. Retention actions and dates have been allocated to some of the categories of records identified as part of the work.</p> <p>SPA has stated that it maintains a minimal amount of paper records and that its business is increasingly conducted electronically. Those paper records which it still manages are kept in filing cabinets within each business area. Some business areas have indexed their case files and these are findable using a 'URN' number. These are reviewed on an annual basis.</p> <p>The RMP also states that the Information Management Team are also engaged in work to review the procedures surrounding the recording and storage of images in the Forensic Services department. The Keeper would appreciate sight of the revised procedures if they have now been finalised.</p> <p>The RMP states that SPA's records retrieval is managed by Police Scotland's IT services. The RMP states that most of its records are now created electronically. It goes on to say that digital records are held on an Image Management System and records are identifiable by their 'URN' numbers. The conversion of images and records held on discs and added to the Image Management System is a project which will be taken forward by SPA. The Keeper requests that he is kept informed of progress in this area.</p>

			<p><b>Shared drives are also utilised within SPA and work is currently being done to ensure that only staff with a need to access certain areas of the drive are able to do so. The Records Manager (see Element 2) and her colleague have access to all areas of the drive and are therefore able to maintain oversight of it. The development and roll-out of fileplans across the organisation accompanied by the use of document naming conventions and version control will allow the consistent naming of files and will allow records to be more easily findable.</b></p> <p>Staff are provided with training on document naming conventions and version control (Appendix 14.2) which will help with consistent naming of files.</p> <p><b>The Keeper can agree this Element on an ‘improvement model’ basis. This means that the authority has identified a gap in provision (the lack of audit trail provision for records managed on the shared drive). The authority has identified how it intends to close this gap. As part of his agreement of this Element, the Keeper will need to be regularly updated on the progress of work to close this gap.</b></p>
<p>12. Competency Framework for records management staff</p>	<p><b>G</b></p>	<p><b>G</b></p>	<p>SPA has submitted the Job Description of the Director for Governance and Assurance (Appendix 1) (see Element 1). This clearly shows that Ms McNeill has responsibility for the strategic overview of Information Management within the authority.</p> <p>Also submitted is the Job Profile of the Records Manager (see Element 2). This clearly states that the Records Manager has responsibility for developing and implementing SPA’s RMP. This responsibility is re-iterated in the Records Management Policy and SOP.</p>

			<p>All staff are required to undertake Data Protection and Information Security training at their induction. A sample of this training has been submitted as evidence (Appendix 14.1). Staff also receive training in Records and Information Management and a sample of this has been submitted (Appendix 14.2). The Development Plan section of this Element commits SPA to providing all staff with relevant training by October 2016. The Keeper commends this provision of staff with the necessary skills to be able to carry out their responsibilities.</p> <p>The Keeper agrees that SPA recognises the importance of records and information management and relevant staff have this reflected in their job profiles.</p>
13. Assessment and Review	<b>G</b>	<b>G</b>	<p>The RMP states that the RMP will be subject to an annual review. The Records Manager will be responsible for carrying out the review. The results of the review will be communicated to the Director of Governance and Assurance (see Element 1) who will then approve any changes or recommendations. This role is confirmed in a letter from the Director of Governance and Assurance to the Keeper (Appendix 2). The Development Plan section of this Element states that in future the results of the annual review of the RMP will be reported to the Senior Management Team for approval.</p> <p>The RMP states that the assessment and review of the RMP will be conducted on an annual basis using the Archives and Records Management Service Quality Management Tool (ARMS) developed by the Scottish Council on Archives in order to self-assess its compliance with its records management requirements.</p> <p>The Keeper can agree that SPA has procedures in place to ensure that the RMP and associated policies and procedures continue to be fit for purpose.</p>
14. Shared	<b>A</b>	<b>A</b>	<p>The RMP states that under the Police and Fire Reform (Scotland) Act 2012 SPA is</p>

Information			<p>required to share information with other law enforcement and government bodies.</p> <p><b>The Forensic Services business area is required to share information with Police Scotland and the Crown Office. SPA has stated that they are currently in the process of developing a Data Servicing Agreement with Police Scotland. Both organisations have recently been audited by the Information Commissioner’s Office and the development of a Data Servicing Agreement was one of the recommendations. SPA has committed to sending the Keeper a copy of the agreement once it has been finalised and approved.</b></p> <p>Guidance is available on SPA’s website on how to submit a request for information under the Freedom of Information (Scotland) Act. Although this Element refers to the arrangements in place for the systematic sharing of information between public bodies, the Keeper welcomes the consideration of other stakeholders.</p> <p><b>The Keeper can agree this Element on an ‘Improvement Model’ basis. This means that the authority has identified a gap in provision (the lack of formal arrangements to share information with other public bodies) and has shown a commitment to closing the gap. This agreement is dependent upon the Keeper receiving the finalised Data Sharing Agreement when available.</b></p>
-------------	--	--	--

### Scottish Police Authority

Third Parties:

The Act makes it clear that records created by a contractor in carrying out a scheduled authority's functions are public records (Part 1 section 3.1 (b)). The Keeper has received a clear statement from the Scottish Police Authority that confirms that "the SPA does not instruct any third party contractor to carry out any of SPA's functions".

## 6. Keeper's Summary

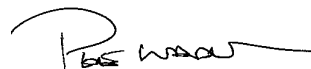
Elements **1 - 14** that the Keeper considers should be in a public authority records management plan have been properly considered by the Scottish Police Authority. Policies and governance structures are in place to implement the actions required by the plan.

## 7. Keeper's Determination

Based on the assessment process detailed above, the Keeper **agrees** the RMP of the **Scottish Police Authority**.

The Keeper recommends that the Scottish Police Authority should publish its agreed RMP as an example of good practice within the authority and the sector.

This report follows the Keeper's assessment carried out by,



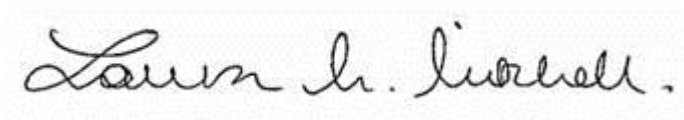
.....  
**Robert Fotheringham**  
Public Records Officer

.....  
**Pete Wadley**  
Public Records Officer

## 8. Endorsement of Report by the Keeper of the Records of Scotland

The report has been examined and is endorsed under the signature of the Keeper of the Records of Scotland as proof of compliance under section 1 of the Public Records (Scotland) Act 2011, and confirms formal agreement by the Keeper of the RMP as submitted by the Scottish Police Authority. In agreeing this RMP, the Keeper expects the Scottish Police Authority to fully implement the agreed RMP and meet its obligations under the Act.

On behalf of the Keeper of the Records of Scotland

A handwritten signature in black ink, reading "Laura M. Mitchell", is displayed on a light grey background.

**Laura Mitchell**

Deputy Keeper of the Records of Scotland